

Message

From: Norm Bernstein [nwbernstein@nwblc.com]
Sent: 5/15/2012 11:40:44 PM
To: Ohl, Matthew [ohl.matthew@epa.gov]
CC: agremos@environcorp.com; Omprakash.Patel@westonsolutions.com; 'Peter Racher' [pracher@psrb.com]; rhutchens@Environcorp.com; 'Ryan, Stephen' [Steve.Ryan@WestonSolutions.com]; Krueger, Thomas [krueger.thomas@epa.gov]
Subject: RE: Third Site - SVE Response
Attachments: image001.gif

Thanks Matt

We will follow up. While what you say about treatment options may be generally applicable to similar sites, however, given the experience with the DNAPL area at this site where in-situ chemical oxidation failed twice, it is unlikely that we would want to seriously consider going down that route again. We will, however, look at the other options, and provide the additional documents you have requested by June 22. We will keep you informed if we run into any problems in that regard.

All the best.

Norm

Norman W. Bernstein, Member
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From: Matthew Ohl [mailto:Ohl.Matthew@epamail.epa.gov]
Sent: Tuesday, May 15, 2012 6:26 PM
To: Norm Bernstein
Cc: agremos@environcorp.com; Omprakash.Patel@westonsolutions.com; 'Peter Racher'; rhutchens@Environcorp.com; 'Ryan, Stephen'; Thomas Krueger
Subject: RE: Third Site - SVE Response

Good afternoon:

1. The comments were in response to the December 14th, 2011 Memorandum from your consultant entitled "Third Site – SVE Area 1 Use of the Statistical Method for Soil Removal Completion" and were directed towards SVE Area 1, however, they are also likely relevant to SVE Area 2.

2. Your e-mail states that "We are not sure if any treatment alternative is viable for SVE Area 1...". A number of remedial measures have been proven effective at sites with similar conditions and are likely viable for SVE Area 1, including:

- in-situ electrical resistive heating
- excavation and disposal in a permitted landfill
- excavation and on-site low-temperature thermal desorption, and
- in-situ chemical oxidation.

Given these remedial measures that have been shown to be viable at similar sites, they should be further explored for use at the site.

Your request to extend the deadline by sixty days appears to be excessive. The excavation alternative has already been explored by your consultant, so evaluation of additional alternative(s), submission of a design report addendum and preparation of a confirmation sampling plan consistent with IDEM guidelines should take about 30 days. In the interest of moving forward EPA will agree to a reasonable extension of time. Please submit the requested information no later than June 22, 2012.

Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov

▼ Norm Bernstein ---05/07/2012 04:25:17 PM---Matt

From: Norm Bernstein <nwbernstein@nwblc.com>
To: Matthew Ohl/R5/USEPA/US@EPA, rhutchens@Environcorp.com, 'Peter Racher' <pracher@psrb.com>, Thomas Krueger/R5/USEPA/US@EPA, Omprakash.Patel@westonsolutions.com, "Ryan, Stephen" <Steve.Ryan@WestonSolutions.com>
Cc: "Ronald E. Hutchens" <rhutchens@environcorp.com>, agremos@environcorp.com
Date: 05/07/2012 04:25 PM
Subject: RE: Third Site - SVE Response

Matt

Two points:

1. The entire discussion regarding statistical methods and excavation is related to SVE Area 1 not SVE Area 2. As previously discussed, we believe that SVE Area 2 is close to compliance and that with relocation of several of the SVE well points, SVE Area 2 is expected to meet objectives. We request clarification that EPA's letter of this date relates to SVE Area 1, not SVE Area 2.

2. The six page single spaced memorandum we received today responded to a report submitted by Environ in mid-December 2011, almost five months ago. We request 90 days not 30 days to submit "an addendum to the design report proposing excavation and/or treatment" as an alternative to the existing Area 1 SVE system and incorporating EPA's

comments. We are not sure if any treatment alternative is viable for SVE Area 1, but it will take 30 to 60 days to determine if one is or is not viable and then at least another 30 days to write and submit the addendum to the design report. Additionally, I note that the memorandum appended to your letter requires that if excavation is to be preformed, part of the addendum to be submitted would need to include the development of a sampling plan that would provide a statistically significant number of additional samples spatially representative of the soils left in place taking into account the concept of "false positives" for all of the constituents of concern. Environ will need to develop that plan in parallel with the review of other options to excavation.

Please clarify that your letter pertains only to SVE Area 1, not SVE Area 2, and please extend the deadline to ninety days, not thirty days.

Thank you for your assistance in this matter.

Norm Bernstein, Trustee

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From: Matthew Ohl [<mailto:Ohl.Matthew@epamail.epa.gov>]
Sent: Monday, May 07, 2012 3:41 PM
To: rhutchens@Environcorp.com; nwbernstein@nwbllc.com; Peter Racher; Thomas Krueger;
Omprakash.Patel@westonsolutions.com; Ryan, Stephen
Subject: Third Site - SVE Response

(See attached file: SVE Area 1 response FINAL.pdf)

Good afternoon:

Please see the attached letter.

Thank you.

Matthew J. Ohl
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